



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
WATER

To: Regional ATP Coordinators and Alternates

From: Richard Reding, Ph.D., Chief
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Topic: Citing Clean Water Act Limited-Use ATP Methods as Modifications

I am writing to our regional partners about citing a method for which a Region has issued a limited-use ATP approval letter that results in modifying another approved method. In addition to documenting that the modification works, to be fully transparent, the user also discloses that a Modified Method X, not just Method X, is being used. This annotation is especially important when modifying a method published by a standards organization, such as the Standard Methods Committee, AOAC, International, or ASTM, International.

For example, a lab with a CWA limited-use approval letter may conduct a luminescent measurement of dissolved oxygen (DO) with any approved method that requires a DO measurement, such as BOD or CBOD by SM5210B. However to do so, the lab will have a copy of a limited-use ATP approval letter. The lab SOP also will cite use of SM 5210B as "modified for luminescent measurement of DO in accordance with the limited-use ATP letter from the region" or similar wording.

Why do we recommend use of limited-use ATP approvals rather than wait for nation-wide approval? Because rulemaking can be a lengthy process. Thus in our national ATP letter, we recommend that regions consider approving use of the ATP under their limited-use ATP approval authority. Is it necessary for a limited-use ATP applicant to submit data, or do a side-by-side comparison in these cases? Our answer is generally no because methods that we review under the CWA ATP program already have multi-lab and comparability data.

Feel free to share this memo with your co-regulators, and the laboratory and method development community. Your contacts are the CWA ATP coordinator Lemuel Walker (walker.lemuel@epa.gov), or the CWA methods team (OSTCWAMethods@epa.gov).

cc: Lemuel Walker, CWA ATP coordinator
Steve Wendelken, SDWA ATP coordinator